

## REMARKS

The application includes claims 7-34 prior to entering this amendment.

The examiner rejects claims 7-34 under 35 U.S.C. § 103(a) as being unpatentable over the combination of Takahashi (U.S. Patent 6,665,439) and further in view of Dube et al. (U.S. Patent 6,782,143).

The applicant amends claims 7-14, 18-25, 29-30, and 32-33. The application remains with claims 7-34 after this amendment.

The applicant adds no new matter and requests reconsideration.

### Claim Rejections - 35 U.S.C. § 103

Regarding claims 7 and 18, the applicant amends the claims to clarify that the feature extractor identifies occurrences of a targeted feature and that the targeted feature is chosen from a group of image features. Takahashi does not teach a group of image features; it teaches only edge features. The whole purpose of the system in Takahashi is to extract edge data from images, so there would be no use for other image features. *See* Takahashi Abstract. Dube is merely cited for interpolating a target pixel and also does not teach a group of image features. Therefore, the combination of Takahashi and Dube does not teach all of the features recited in claims 7 and 18.

Further, there is no motivation or reason to combine Takahashi with Dube. The Office Action proposes that one would be motivated to make this combination because one "would be able to utilize different interpolation techniques in interpolating pixels of the image (FIG. 10)." *See* Office Action page 3. However, Takahashi does not teach an interpolation technique and interpolation would render Takahashi unsatisfactory for its intended purpose. Specifically, the purpose of Takahashi is to detect the edges of an image as they exist in the original image. *See* Takahashi Abstract. Interpolating the edge data in Takahashi would not result in a true rendition of the edge data of the original image, and thus would render Takahashi unsatisfactory for its intended purpose. Therefore, there would be no reason or motivation to combine the interpolation of Dube with the edge detector of Takahashi.

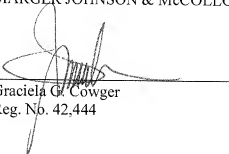
For at least the reasons identified above, claims 7 and 18 are allowable over the combination of Takahashi and Dube. Dependent claims 8-17 and 19-34 are likewise allowable.

### **Conclusion**

For the foregoing reasons, reconsideration and allowance of claims 7-34 of the application as amended is requested. The Examiner is encouraged to telephone the undersigned at (503) 222-3613 if it appears that an interview would be helpful in advancing the case.

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